

REMARKS

Favorable reconsideration and allowance of the present application are respectfully requested in view of the following remarks. Claims 1-25 were pending prior to the Office Action. Claim 26 has been added through this Reply. Therefore, claims 1-26 are pending. Claims 1, 9, and 15 are independent.

§ 103 REJECTION – HOFRICHTER, AIZU

Claims 1-25 stand rejection under 35 USC §103(a) as allegedly being unpatentable over Hofrichter (WO 02/37217 A2) in view of Aizu (US Patent 6,839,978). Applicants respectfully traverse this.

For a §103 rejection to be proper, a *prima facie* case of obviousness must be established. *See M.P.E.P. 2142*. One requirement to establish *prima facie case* of obviousness is that the prior art references, when combined, must teach or suggest all claim limitations. *See M.P.E.P. 2142; M.P.E.P. 706.02(j)*. Thus, if the cited references fail to teach or suggest one or more elements, then the rejection is improper and must be withdrawn.

In this instance, independent claim 1 recites, in part “repeatedly sending a status request signal to the at least one slave device and receiving one or more response signals from the at least one slave device” and “constructing an operation history database by cumulatively storing operation status data included in each response signal, wherein the microprocessor extracts data from the operation history database when a history inquiry request is received from a user.” In other words, in response to a status request signal, a slave device outputs one or more response signals in response. From these responses, an operation history database is maintained. The

operation history database is a database of operation status of the slave devices received in response to the status request signal. The data of the operation history database can be extracted in response to a history inquiry request from a user. In other words, the history inquiry request is a request from the user to extract the operation history data.

In the Office Action, the Examiner alleges that the feature of constructing the operation history database by cumulatively storing operation status data included in each response signal is disclosed in Hofrichter. *See Office Action, page 3, second paragraph.* More specifically, the Examiner alleges that step 214 as illustrated in Fig. 4 of Hofrichter teaches this feature. A closer observation of the step 214 as disclosed merely indicates that upon startup, a log file a history of use of the devices are read. *See Hofrichter, page 12, lines 22-25.* There is no indication of how these log files come to be generated. Moreover, Hofrichter is entirely silent regarding whether any history inquiry request is received from a user. Thus, contrary to the Examiner's allegation, Hofrichter cannot be relied upon to teach or suggest a feature of extracting data from the operation history database when a history inquiry request is received from a user as recited in the independent claims.

Aizu cannot be relied upon to correct for at least the above noted deficiency of Hofrichter. More specifically, the Examiner alleges that column 19, lines 63-67 of Aizu discloses the feature of extracting data from the operation history database when a history inquiry request is received from a user. *See Office Action, page 4, last paragraph.*

A closer inspection of Aizu reveals that the Examiner's analysis is in error. According to Aizu, the "operation history information" refers to the history of operations received from the

user. *See Aizu, column 19, lines 35-41.* In other words, the operation history information is a recorded history of actions taken by the user.

In contrast, the operation history database as claimed is a cumulative data of operation status of the slave devices. Clearly, the operation history information as disclosed in Aizu cannot be equivalent to the operation history database as featured in the independent claims. Moreover, Aizu is also entirely silent regarding whether the user is able to request the extraction of data from a database. In short, Aizu also fails to teach or suggest the feature of extracting data from the operation history database when a history inquiry request is received from a user.

Because neither Hofrichter nor Aizu can be relied upon to teach or suggest at least the above recited feature, the combination also fails to teach or suggest at least the above recited feature. Therefore, independent claims 1, 9, and 15 are distinguishable over Hofrichter and Aizu.

Claims 2-8, 10-14, and 16-25 depend from independent claims 1, 9, or 15 directly or indirectly. Therefore, for at least the reasons stated with respect to the independent claims, these dependent claims are also distinguishable over the combination of Hofrichter and Aizu.

In the alternative, the dependent claims are also distinguishable on their own merit. For example, claims 7 and 14 recite that the memory cumulatively stores operation status data regardless of whether or not a message BLOCK function of the master device is currently activated or not. The Examiner pointed to Hofrichter, page 12, lines 22-25 as allegedly disclosing this feature. However, a closer inspection reveals that Hofrichter merely discloses a log file of history of use is created. Hofrichter is entirely silent regarding whether the BLOCK function as recited.

Claim 4 recites that the history inquiry request received from the user includes a selection of a period of time. As shown above, neither Hofrichter nor Aizu can be relied upon to teach or suggest the feature of the history inquiry request from the user in the first place. Thus, it follows that neither Hofrichter nor Aizu can be relied upon to teach or suggest the particular features of the history inquiry request.

For at least the reasons stated above, Applicant respectfully requests that the rejection of claims 1-25 based on Hofrichter and Aizu be withdrawn.

NEW CLAIMS

Claim 26 has been added through this reply. Claim 26 is believed to be distinguishable over the cited references, individually or in any combination. Applicant respectfully requests that the new claim 26 be allowed.

CONCLUSION

All objections and rejections raised in the Office Action having been addressed, it is respectfully submitted that the present application is in condition for allowance. Should there be any outstanding matters that need to be resolved, the Examiner is respectfully requested to contact Hyung Sohn (Reg. No. 44,346), to conduct an interview in an effort to expedite prosecution in connection with the present application.

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If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

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Respectfully submitted,

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